IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Jean-Yves Sireau   Confirmation No. 7436

Application No. 09/764,778

Filed: January 17, 2001

For: **BETTING SYSTEM AND METHOD**

Group Art Unit: 3693

Examiner: Jagdish Patel

Attorney Docket No. 63204/1:1 (formerly 23677/15:1)

DECLARATION OF JEAN-YVES SIREAU
 PURSUANT TO 37 CFR § 1.132

TO THE COMMISSIONER FOR PATENTS:

Dear Sir:

I, Jean-Yves Sireau, hereby declare:

1.   I am currently the founder, Chairman and CEO of Regent Markets Group Ltd, formerly known as Fixed-Odds Group Ltd. and Exbet.com Ltd.

2.   Regent Markets Group Limited is the assignee of the above-identified application No. 09/764,778 by virtue of an assignment recorded at the U.S. Patent and Trademark Office at Reel 011478, Frame 0911, and documentation attached at Exhibit C showing the name change from Exbet.com Ltd. to Fixed-Odds Group Ltd. and from Fixed-Odds Group Ltd. to Regent Markets Group Ltd.

3.   Attached hereto as <u>Exhibit A</u> is a copy of claims 19-22, 24-28, 30-36, and 50-113, which upon information and belief are pending in application No. 09/764,778.

4.   Attached hereto as <u>Exhibit B</u> is a copy of an article titled "Exbet Receives Financial Betting License", PR Newswire (Feb. 15, 2000) (hereinafter the "PR Newswire article"), which was cited in the Office action dated October 19, 2006 as grounds for rejecting the claims.

5.   Attached hereto as <u>Exhibit C</u> is a Certificate of Incorporation upon change of name, evidencing the name change from Exbet.com Ltd. to Fixed-Odds Group Ltd. and from Fixed-Odds Group Ltd. to Regent Markets Group Ltd.

6.   I have reviewed Exhibits A and B and C, and the October 19, 2006 Office action.
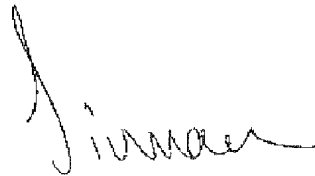
Unequivocal Statement of Inventorship:

6.   I am the sole inventor of the subject matter of pending claims 19-22, 24-28, 30-36, and 50-113.

7.   The relevant portions of the PR Newswire article describe my work and my inventions.

8.   I am the sole inventor of the subject matter described in the PR Newswire article that was relied upon as a basis for rejection of the pending claims.

9.   I hereby further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and, further, that these statements are made with knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of U.S. Application Serial No. 09/764,778 or any patent issuing thereon.

Signed at London, UK on October 26, 2006.

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Jean-Yves Sireau

EXHIBIT A
to Declaration of Jean-Yves Sireau

19. (previously presented) A method of operating a fixed-odds betting system including a central processing machine in communication with a data feed to a source of data concerning a financial market, and a user terminal in communication with the central processing machine, the method comprising the steps of:

via the user terminal, accepting from a user multiple parameters relating to a fixed-odds bet on an aspect of a financial market;

at the central processing machine, receiving one or more of the parameters from the user terminal;

at the central processing machine, obtaining data concerning the financial market via the data feed; and

at the central processing machine, calculating a fixed-odds price for the bet based on at least one of the parameters received from the user terminal and the data obtained from the data feed.

20. (previously presented) A method according to claim 19, further comprising displaying the calculated fixed-odds price to the user.

21. (previously presented) A method according to claim 19, further comprising:
receiving an authorization from the user to place the bet; and
receiving a payment from the user for placing the bet.

22. (previously presented) A method according to claim 19, further comprising:
placing the bet; and
crediting an account of the user in response to fluctuation of said aspect of the financial market satisfying the parameters of the bet.

23. (cancelled).

24. (previously presented) A method according to claim 19, wherein the step of obtaining data concerning the financial market includes obtaining real-time data.

25. (previously presented) A method according to claim 19, wherein the step of obtaining data concerning a financial market includes obtaining historical data representative of a history of market prices.

26. (original) A method according to claim 19, wherein the step of calculating the fixed-odds price comprises calculating an estimate of a future volatility of the financial market.

27. (previously presented) A method according to claim 19, further comprising:
before calculating the fixed-odds price, checking the parameters input by the user for logical inconsistencies therebetween.

28. (previously presented) A method according to claim 19, further comprising:
before calculating the fixed-odds price, checking an opening time of the financial market.

29. (cancelled).

30. (previously presented) A method according to claim 19, wherein:
the central processing machine is in communication with a second data feed to a source of data concerning a second financial market different from the financial market; and
the step of receiving parameters from the user terminal includes receiving parameters relating to an aspect of the second financial market.

31. (previously presented) A method according to claim 19, wherein:
the central processing machine is in communication with a second data feed to a source of data concerning a second financial market different from the financial market; and

the step of calculating the fixed-odds price for the bet includes calculating a correlation matrix containing information concerning the financial market and the second financial market.

32. (previously presented) A method according to claim 19, wherein the system further includes a data storage facility accessible by the central processing machine, and further comprising storing in the data storage facility information relating to previously placed bets.

33. (previously presented) A method according to claim 32, further comprising reading from the data storage facility the stored information relating to previously placed bets, and wherein the step of calculating the fixed-odds price for the bet includes calculating a hedging factor based on the information concerning the previously placed bets read from the storage facility.

34. (previously presented) A method according to claim 32, further comprising:
at the central processing machine, calculating a price at which to offer to buy one or more of the previously placed bets.

35. (previously presented) A method according to claim 34, further comprising providing the price to the user via the user terminal.

36. (previously presented) A computer program embodied on a computer readable medium and operable on a central processing machine in communication with a data feed, for:
receiving one or more parameters from a user relating to a fixed-odds bet on an aspect of a financial market;
obtaining data concerning the financial market via the data feed; and
calculating a fixed-odds price for the bet based on at least one of the parameters received from the user and the data obtained via the data feed.

Claims 37-49 (cancelled).

50. (previously presented) A computer program according to claim 36, wherein the step of calculating the fixed-odds price comprises calculating an estimate of a future volatility of the financial market.

51. (previously presented) A computer program according to claim 50, wherein:

the data feed includes a real-time data feed; and

the step of obtaining data concerning the financial market includes obtaining real-time data concerning the financial market via the data feed; and

the step of calculating the fixed-odds price is at least partially based on the real-time data.

52. (previously presented) A method according to claim 19, wherein the financial market includes a foreign currency market.

53. (previously presented) A method according to claim 19, wherein the financial market includes a commodities market.

54. (previously presented) A method according to claim 19, wherein the financial market includes a stock market.

55. (previously presented) A method according to claim 19, wherein the aspect of the financial market includes a change in a market index.

56. (previously presented) A method according to claim 19, wherein the aspect of the financial market includes a change in a stock price.

57. (previously presented) A method according to claim 19, wherein the aspect of the financial market includes a change in a foreign currency exchange rate.

58. (previously presented) A method according to claim 19, wherein the step of receiving one or more parameters from the user terminal includes receiving an identifier of a selected financial market.

59. (previously presented) A method according to claim 19, wherein the step of receiving one or more parameters from the user terminal includes receiving information regarding an amount that the user wishes to win.

60. (previously presented) A method according to claim 19, wherein the step of receiving one or more parameters from the user terminal includes receiving a target level of the aspect of the financial market.

61. (previously presented) A method according to claim 26, wherein:

the step of obtaining data concerning the financial market includes obtaining real-time data concerning the financial market; and

the step of calculating the estimate of the future volatility of the financial market is at least partially based on the real-time data.

62. (previously presented) A fixed-odds betting system comprising:

means for accepting bet parameters from a user relating to a fixed-odds bet on an aspect of a financial market;

means for obtaining financial market data; and

means for calculating a fixed-odds price for the fixed-odds bet based on at least one of the bet parameters from the user and at least some of the financial market data obtained.

63. (previously presented) A fixed-odds betting system according to claim 62, wherein at least one of the bet parameters is a predicted performance of an aspect of the financial market and further comprising means for calculating a fixed odds for the predicted performance of the financial market.

64. (previously presented) A fixed-odds betting system according to claim 63, wherein the predicted performance includes a predicted fluctuation of the aspect of the financial market during a bet period of the bet.

65. (previously presented) A fixed-odds betting system comprising:

a user terminal operable to accept from a user multiple parameters relating to a fixed-odds bet on an aspect of a financial market;

a data feed to a source of data concerning the financial market; and

a central processing machine in communication with the data feed and the user terminal, the central processing machine operable to calculate a fixed-odds price for the fixed-odds bet based on at least one of the parameters input by the user and data obtained from the data feed.

66. (previously presented) A computer-implemented method for betting on a financial market, comprising:

presenting an interface including a set of menus for facilitating selection of a set of parameters for a bet;

receiving the set of parameters from a user via the interface;

obtaining financial market data concerning the financial market;

calculating a fixed-odds price for the bet based on the set of parameters received from the user and at least some of the financial market data;

offering the bet to the user for the fixed-odds price; and

receiving from the user an acceptance of the offer and a payment of the fixed-odds price.

67. (previously presented) A method according to claim 66, wherein the financial market includes a foreign currency market.

68. (previously presented) A method according to claim 66, wherein the financial market includes a commodities market.

69. (previously presented) A method according to claim 66, wherein the financial market includes a stock market.

70. (previously presented) A method according to claim 66, wherein the set of parameters includes a change in a market index.

71. (previously presented) A method according to claim 66, wherein the set of parameters includes a change in a stock price.

72. (previously presented) A method according to claim 66, wherein the set of parameters includes a change in a foreign currency exchange rate.

73. (previously presented) A method according to claim 66, wherein the set of parameters includes a selected financial market.

74. (previously presented) A method according to claim 73, wherein the set of parameters includes:
    a target for the selected financial market;
    a second selected financial market; and
    a target for the second selected financial market.

75. (previously presented) A method according to claim 74, wherein the step of calculating the fixed-odds price for the bet includes calculating a correlation matrix for the selected financial market and the second selected financial market.

76. (previously presented) A method according to claim 66, wherein the set of parameters includes a bet period.

77. (previously presented) A method according to claim 76, wherein calculating the fixed-odds price comprises estimating a future volatility of the financial market during the bet period.

78. (previously presented) A method according to claim 66, wherein the set of parameters includes a bet expiration time.

79. (previously presented) A method according to claim 78, wherein calculating the fixed-odds price comprises estimating a future volatility of the financial market for a period preceding the bet expiration time.

80. (previously presented) A method according to claim 66, wherein the financial market data includes real-time market data.

81. (previously presented) A method according to claim 66, wherein the financial market data includes historical market data.

82. (previously presented) A method according to claim 66, wherein the set of parameters includes a target for an aspect of the financial market.

83. (previously presented) A method according to claim 82, wherein the target includes a range.

84. (previously presented) A method according to claim 82, wherein the target includes a barrier.

85. (previously presented) A method according to claim 82, wherein the financial market includes a foreign currency market and the target includes a predicted currency exchange rate.

86. (previously presented) A method according to claim 82, wherein the financial market includes a stock market and the target includes a predicted stock price.

87. (previously presented) A method according to claim 82, wherein the aspect of the financial market includes a market index.

88. (previously presented) A method according to claim 87, wherein the financial market includes a commodities market.

89. (previously presented) A method according to claim 87, wherein the financial market includes a stock market.

90. (previously presented) A method according to claim 66, further comprising:

monitoring the financial market; and

in response to the financial market meeting the set of parameters, providing a bet payoff to the user.

91. (previously presented) A method according to claim 90, wherein the set of parameters includes a bet period and the step of monitoring of the financial market includes obtaining market data for the bet period.

92. (previously presented) A method according to claim 66, wherein the step of offering the bet to the user involves offering the bet to the user for a limited time.

93. (previously presented) A method according to claim 92, wherein the limited time is between 30 seconds and 60 seconds.

94. (previously presented) A method according to claim 66, wherein:

the financial market has a growth rate; and

the step of calculating the fixed-odds price is at least partially based on the growth rate.

95. (previously presented) A method according to claim 66, wherein the bet has a bet expiration time, and, after receiving the acceptance and the payment from the user and before the bet expiration time, further comprising:

    calculating a current value of the bet; and

    offering to buy the bet from the user for a price based on the value of the bet.

96. (previously presented) A method according to claim 66, further comprising:

    storing information concerning the bet and one or more other previously-placed bets; and

    calculating a hedging factor based on the bet and the previously-placed bets.

97. (previously presented) A method according to claim 66, further comprising:

    storing predictions made by multiple bettors;

    comparing the predictions to outcomes of events to which the predictions relate; and

    identifying at least one successful bettor whose predictions are consistently similar to the outcomes.

98. (previously presented) A method according to claim 97, further comprising offering to a third party information comprising subsequent predictions made by the at least one successful bettor.

99. (previously presented) A system according to claim 65, wherein the data feed includes a real-time data feed to a source of real-time data concerning the financial market.

100. (previously presented) A system according to claim 65, wherein the source of data concerning the financial market includes a source of historical data concerning the financial market.

101. (previously presented) A system according to claim 65, wherein the central processing machine is in communication with the data feed over a data communications network.

102. (previously presented) A system according to claim 65, further comprising a second data feed to a source of data concerning a second financial market different from the financial market.

103. (previously presented) A system according to claim 102, wherein the central processing machine is operable to compute a correlation matrix for the financial market and the second financial market.

104. (previously presented) A system according to claim 65, wherein the central processing machine is in communication with the user terminal over a data communications network.

105. (previously presented) A system according to claim 104, wherein the central processing machine serves an interface to the user terminal, and the user terminal is operable to display the interface to the user for facilitating input of the parameters.

106. (previously presented) A system according to claim 105, wherein the interface includes a set of menus from which the user can select at least some of the parameters.

107. (previously presented) A system according to claim 65, further comprising a data storage facility accessible by the central processing machine, the data storage facility operable for storing information regarding previously placed bets.

108. (previously presented) A system according to claim 65, further comprising a multiple other user terminals in communication with the central processing machine for accepting bets from other users, and wherein the central processing machine is operable to identify one or more successful users whose bets are consistently successful.

109. (previously presented) A system according to claim 108, further comprising means for providing to a third party information concerning bets placed by one or more of the successful users.

110. (previously presented) A system according to claim 65, further comprising a facility for buying back the fixed-odds bet from the user.

111. (previously presented) A system according to claim 65, further comprising a payment system in communication with the central processing machine and configured to receive a payment from the user for the fixed-odds price.

112. (previously presented) A system according to claim 65, further comprising an accounting system linked to the central processing machine.

113. (previously presented) A system according to claim 112, wherein the accounting system maintains an account for the user and credits the account in response to fluctuation of said aspect of the financial market satisfying the parameters of the fixed-odds bet.

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02413707   Supplier Number: 59468692 (THIS IS THE FULLTEXT)
 Exbet Receives Financial Betting License.
PR Newswire, p0646
Feb 15, 2000
TEXT:
 TORONTO, Feb. 15 /CNW-PRN/ - International Pursuit Corporation ("Pursuit")
(TSE - IPJ) is pleased to announce that a wholly-owned subsidiary of
Exbet.com Ltd. ("Exbet.com"), Cbet.com (Cook Islands) Ltd. ("Cbet.com"),
has received an Exemption Notice issued by the Ministry of Finance of the
Cook Islands, permitting it to operate a business of tax-free fixed-odds
financial betting via the Internet.
 Exbet.com will be the first company to offer a comprehensive
fixed-odds betting service on financial stock indices and eventually a
whole range of equity and foreign exchange related bets. Exbet.com is
affiliated with Regent Pacific Group Ltd., a company listed on the Hong
Kong and Frankfurt Stock Exchanges and controlled by Internet financier Jim
Mellon.
 Exbet.com intends to be the market leader in fixed-odds financial
betting by establishing a round-the-clock financial betting service on a
variety of financial indices. Cbet.com will offer fixed-odds on bets
ranging from one-touch, no-touch, range and win, place, quinella, on
combinations of market indices selected by customers on the www.cbet.com
Web site.
  · Fixed-odds financial betting offers unique advantages over other
speculative tools such as futures, options or spread betting. Clients' risk
is limited to the amount they have staked on a bet, yet payouts are often
many multiples of the initial stakes. Cbet.com's betting service offers
clients the ability to customize their own bets by entering expiry dates
and barrier levels into the Web site, and to calculate the payouts of their
bets in realtime. A number of spread betting Internet based Web sites exist
today none of which provide the limited risk, range of bets, leverage or
tax-free features that Exbet.com and its sister site, Cbet.com, will offer.
 The Cbet.com Web site has the unique advantage of tax-free betting to
its clients, thereby permitting Cbet.com to offer highly competitive
payouts to clients. Numerous examples of financial bets available on the
Cbet.com Web site conclusively show distinct payout advantages over
comparable listed speculative instruments.
 Exbet.com is proud to be associated with the Cook Islands
jurisdiction which has recently emerged as a leading and progressive
e-commerce jurisdiction with strong political and legal foundations. The
Cook Islands are a self-governing jurisdiction in association with New
Zealand, whom retains responsibility for external affairs and defense. The
Cook Islands Government is carried out by an elected parliament and the
Cook Islands legal system is common law and is closely based on applicable
statutes of England.
 Cbet.com is expected to go live shortly once beta-testing of the
www.cbet.com site is complete. Beta-testing of the site is conducted via
the www.gamebet.com fantasy betting game where participants can open
virtual accounts and win cash prizes.
 Exbet.com is also in the process of forming a subsidiary Exbet.com
Finanzwetten GmbH in Feldkirch, Austria. Exbet.com Finanzwetten GmbH will
apply for a bookmakers license from the government of Vorarlberg, Austria
in order to operate the German language www.finanzwetten.at financial
betting service.
 Exchangebet.com Holdings Ltd., the intermediate holding company for
Exbet.com Ltd., has recently entered into a letter of intent with Pursuit,
whereby Pursuit, subject to regulatory approval, will acquire fifty (50%)
percent of Exbet.com. Both companies are proceeding with all the necessary
steps to complete the transactions and the issuance of the license to
Cbet.com was a key step in completion of the transaction.
 Pursuit's other assets include a Web site called Stockset.com (which
is under agreement to be sold for $500,000), a development stage copper
property in the Philippines and exploration mineral properties in
Indonesia.

ON BEHALF OF THE BOARD
G. E. Creber
President and Chief Executive Officer

EXHIBIT C
Page 1 of 2

IBC 05

COMMONWEALTH OF THE BAHAMAS

THE INTERNATIONAL BUSINESS COMPANIES ACT (1990)

CERTIFICATE OF INCORPORATION

(Change of Name)

(Section 11)

No. 97,392 B FIXED-ODDS GROUP LTD. FORMERLY EXBET.COM LTD.

I, STERLING R.L. QUANT............., Registrar General of the Commonwealth of The Bahamas DO HEREBY CERTIFY pursuant to the International Business Companies Act (No. 2 of 1990) that

FIXED-ODDS GROUP LTD.

is incorporated in the Commonwealth of The Bahamas as an International Business Company and that the former name of the said company was EXBET.COM LTD.

which name has now been changed this 27TH day of JUNE 49 2000

to FIXED-ODDS GROUP LTD.

Given under my hand and seal
at Nassau in the Common-
wealth of The Bahamas

Registrar General

CERTIFIED TO BE A TRUE COPY
OF THE ORIGINAL DOCUMENT

P.T.C. Management Limited
Registered Agent

I hereby certify this to be a true
and correct copy.

Notary Public

IBC 05

COMMONWEALTH OF THE BAHAMAS

THE INTERNATIONAL BUSINESS COMPANIES ACT (2000)

(Section 12)

CERTIFICATE OF INCORPORATION
(Change of Name)

No. 97,392   REGENT MARKETS GROUP LTD. FORMERLY FIXED-ODDS GROUP LTD. FORMERLY EXBET.COM LTD.

I, JACINDA P. BUTLER .... ASST., Registrar General of the Commonwealth of The Bahamas DO HEREBY CERTIFY pursuant to the International Business Companies Act 2000 (No. 45 of 2000) that

REGENT MARKETS GROUP LTD.   is incorporated in the Commonwealth of The Bahamas as an International Business Company and that the former name of the said company was FIXED-ODDS GROUP LTD. which name has now been changed this   9TH   day of   JULY , 2003

to   REGENT MARKETS GROUP LTD.

Given under my hand and seal at Nassau in the Commonwealth of The Bahamas

ASST. Registrar General

COMMONWEALTH OF THE BAHAMAS

Registrar General's Department

I certify the foregoing to be a true copy of the original document.

Registrar General